

# MORRISON MAHONEY LLP

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January 26, 2021

**VIA ECF**

Hon. Ramon E. Reyes, Jr.  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Allstate Ins. Co., et al. v. Svetlana Khotenok, et al.*, 18-cv-05650 (FB) (RER)**  
**Motion to Adjourn Show Cause Hearing**

Dear Magistrate Judge Reyes:

We represent Plaintiffs in the above-referenced matter and jointly with counsel for Defaulted Defendants Shaikh Jauhar Ahmed, MD and A.R.A Medical Care, P.C. ("Respondents"), respectfully request that, pursuant to Rule II.C of the Court's Motion and Individual Practice Rules, the Court adjourn the Show Cause Hearing, concerning Plaintiffs' request for contempt sanctions against Respondents for failure to appear for a court ordered deposition. The hearing is currently set for January 27, 2021 by Order to Show Cause entered December 23, 2020 ("Order") (ECF No. 117), and the parties request that the hearing be adjourned until February 17, 2021, or another date convenient for the Court, as they have reached an agreement in principle, including an agreed upon amount for attorneys' fees, with respect to the relief sought in the motion and the adjournment time will allow the parties time to finalize the agreement. Please note that this is the first request made for an adjournment of this Show Cause Hearing, to which all parties subject to the Order consent. Upon completion of the agreement, Plaintiffs will write the Court and withdraw the motion.

Thank you for the Court's consideration in this regard.

Respectfully submitted,

By: Morrison Mahoney, LLP

/s/Lee Pinzow  
Lee Pinzow

cc: All Counsel (Via ECF)